

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
**APR 19 2022**  
SEAN F. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

Vanessa R. Waldref  
United States Attorney  
Eastern District of Washington  
Michael D. Murphy  
Assistant United States Attorney  
402 E. Yakima Ave., Suite 210  
Yakima, WA 98901  
Telephone: (509) 454-4425

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

1:22-CR-2042-SAB-1

Plaintiff,

INDICTMENT

v.

Vios: 18 U.S.C. § 2252A(a)(2), (b)(1)  
Distribution of Child Pornography  
(Count 1)

GREGORY ALEXANDER NEVEU,

Defendant.

18 U.S.C. § 2252A(a)(5)(B), (b)(2):  
Possession of Child Pornography  
(Count 2)

18 U.S.C. § 2253  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about January 13, 2022, and on or about January 22, 2022,  
within the Eastern District of Washington, the Defendant, GREGORY  
ALEXANDER NEVEU, did knowingly distribute child pornography, as defined in  
18 U.S.C. § 2256(8), that had been mailed, shipped and transported in and

INDICTMENT-1

1 affecting interstate and foreign commerce by any means, including by computer,  
2 and that was transported via any means or facility of interstate and foreign  
3 commerce, to wit: images depicting minors engaging in sexually explicit conduct,  
4 including but not limited to actual and simulated intercourse, and the lascivious  
5 exhibition of the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all  
6 in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).  
7

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
COUNT 2

On or about February 23, 2022, within the Eastern District of Washington,  
the Defendant, GREGORY ALEXANDER NEVEU, did knowingly possess  
material that contained images of child pornography, as defined in 18 U.S.C.  
§ 2256(8)(A), that had been mailed, and shipped and transported using any means  
and facility of interstate and foreign commerce and in and affecting interstate and  
foreign commerce by any means, including by computer, and that was produced  
using materials that had been mailed, and shipped and transported in and affecting  
interstate and foreign commerce by any means, including by computer, to wit:  
visual depictions of minors, including prepubescent minors and minors who had  
not attained 12 years of age, engaging in sexually explicit conduct, all in violation  
of 18 U.S.C. § 2252A(a)(5)(B), (b)(1).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and  
incorporated by reference for the purpose of alleging forfeitures.

INDICTMENT-2

1 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of  
2 18 U.S.C. § 2252A(a)(2), (b)(1), and/or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as  
3 alleged in this Indictment, the Defendant, GREGORY ALEXANDER NEVEU,  
4 shall forfeit to the United States any visual depiction described in section 2251,  
5 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine,  
6 periodical, film, videotape, or other matter which contains any such visual  
7 depiction, which was produced, transported, mailed, shipped or received in  
8 violation of this chapter; any property, real or personal, constituting or traceable to  
9 gross profits or other proceeds obtained from such offenses; and, any property, real  
10 or personal, used or intended to be used to commit or to promote the commission  
11 of such offenses, or any property traceable to such property, including, but not  
12 limited to, the following:  
13

- 14 - Corsair Desktop Computer Tower;
- 15 - Gateway Desktop DX4300 Computer.

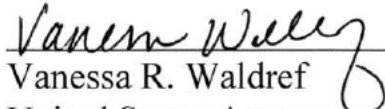
16 If any of the property described above, as a result of any act or omission of the  
17 Defendant:  
18


- 19 a. cannot be located upon the exercise of due diligence;
- 20 b. has been transferred or sold to, or deposited with, a third party;
- 21 c. has been placed beyond the jurisdiction of the Court;
- 22 d. has been substantially diminished in value; or
- 23 e. has been commingled with other property which cannot be  
24 divided without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

3  
4 DATED this 19<sup>th</sup> day of April 2022.

5 A TR

6  
7  
8  
9  
10   
11 Vanessa R. Waldref  
12 United States Attorney

13   
14 Michael D. Murphy  
15 Assistant United States Attorney  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28